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## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
ALEX A. KIBKALO,
Defendant.

The United States Attorney charges that:

## COUNT 1 (Theft of Trade Secrets)

On or about August 18, 2012, at Redmond, within the Western District of Washington, and elsewhere, ALEX A. KIBKALO, with intent to convert trade secrets belonging to Microsoft, specifically, Microsoft's Activation Server Software Development Kit, to the economic benefit of someone other than Microsoft, which trade secrets were related to and included in products that were produced for and placed in interstate and foreign commerce, did knowingly and without authorization download, upload, transmit, deliver, send, communicate, and convey such information from //

Microsoft's computer system, and did attempt to do so, intending and knowing that such acts would injure Microsoft. All in violation of Title 18, United States Code, Section 1832(a)(2), (a)(4), and 2. DATED this \_\_\_\_\_\_ day of March, 2014. ANDREW C. FRIEDMAN **Assistant United States Attorney** Assistant United States Attorney